

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHELLE CHRISTIAN,

Plaintiff/Counterclaim  
Defendant,

v.

OMNIS GLOBAL TECHNOLOGIES, LLC;  
OMNIS BUILDING TECHNOLOGIES, LLC;  
OBT BLUEFIELD, LLC; OMNIS FUEL  
TECHNOLOGIES LLC D/B/A OMNIGEN;  
AND OMNIS SUBLIMATION RECOVERY  
TECHNOLOGIES, LLC,

Defendants/Counterclaim  
Plaintiffs, and

SIMON HODSON

Counterclaim Plaintiff.

Civil Action No. 2:24-cv-01319

**COUNTERCLAIM FOR DEFAMATION**

Counterclaim Plaintiffs Simon Hodson, and Omnis Global Technologies, LLC; Omnis Building Technologies, LLC; OBT Bluefield, LLC; Omnis Fuel Technologies, LLC D/B/A Omnigen;<sup>1</sup> and Omnis Sublimation Recovery Technologies, LLC, (“Defendants”), assert a counterclaim against Michelle Christian (“Ms. Christian”).

1. Counterclaim Plaintiffs have initiated this counterclaim to redress violations against Ms. Christian for her continuing defamation.<sup>2</sup>

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<sup>1</sup> Effective July 10, 2024, Defendants’ DBA is no longer Omnigen, but Omnis Energy.

<sup>2</sup> In her Complaint, Ms. Christian indicates her intent to amend the Complaint to include violations of the PHRA against Simon Hodson individually. (ECF 1, n. 1).

**JURISDICTION**

2. The Court has supplemental jurisdiction over the counterclaim pursuant to 28 U.S.C. §1337(a) because the counterclaim is so related to claims in the action within such original jurisdiction that they form part of the same case or controversy under Article III of the United States Constitution: the allegations in the counterclaim are interwoven with the allegations in ¶¶ 42-56 of the complaint.

3. This Court may properly maintain personal jurisdiction over Ms. Christian since she initiated suit, and lives in, in the Eastern District of Pennsylvania.

4. Venue is proper in the Eastern District of Pennsylvania under 28 U.S.C. § 1331(b) because the events giving rise to Defendants' claim occurred in this District, and because Ms. Christian lives in this District.

**FACTUAL ALLEGATIONS**

5. Fahmy Hudome Int'l, LLC and Omnis Fuel Technologies, LLC entered into a third-party consultancy agreement on April 28, 2023. Randa Fahmy is the sole member of Fahmy Hudome Int'l, LLC.

6. Pursuant to the consultancy agreement, Ms. Fahmy assists Omnis Fuel Technologies, LLC in its quest to educate, advocate, and secure specific grant, loan, and tax credit programs devised to assist the hydrogen green energy sector.

7. As a result, Ms. Christian's work with OBT Bluefield and Ms. Fahmy's work with the Omnis family of entities overlapped from April 2023 through the end of Ms. Christian's employment.

8. On June 27, 2024, Ms. Christian requested to call, and called, Ms. Fahmy.

9. During that phone call, Ms. Christian told Ms. Fahmy that Simon Hodson “is trafficking women” and “trafficked two young women and had me involved in it.”

10. Ms. Christian stated that “one of them I put up in an apartment and they married off the other one to some Mormon guy.”

11. Ms. Christian then stated “yeah, he’s trafficking women like Jeffrey Epstein.”

12. Ms. Fahmy understood Ms. Christian’s reference to “trafficking women” to mean the criminal offense of human trafficking.

13. Ms. Fahmy understood Ms. Christian’s use of the pronoun “they” in her statement “they married off the other one to some Mormon guy” to include the employees of the Omnis family of companies.

14. Several of the Executives of the Omnis family of companies, including Mr. Hodson, are members of The Church of Jesus Christ of Latter-Day Saints (“LDS”).

15. Ms. Fahmy understood Ms. Christian’s use of the term “Mormon” to mean “LDS.”

16. Ms. Fahmy understood Ms. Christian’s use of the phrase “like Jeffrey Epstein” to compare Mr. Hodson to the deceased, convicted sex offender who was arrested and charged with federal sex trafficking and conspiracy to engage in sex trafficking in July 2019.

17. Ms. Fahmy understood Ms. Christian’s June 27, 2024, statements to mean that Mr. Hodson and the Omnis family of companies committed and are committing the criminal offense of human trafficking.

18. During the June 27, 2024 discussion, Ms. Christian encouraged Ms. Fahmy to review the complaint in this case.

19. Accordingly, Ms. Christian defamed Mr. Hodson and the Omnis family of companies.

## COUNT 1: DEFAMATION

20. Defendants incorporate the assertions in the paragraphs above, as if fully set forth at length herein.

21. Ms. Christian's June 27, 2024, communication to Ms. Fahmy was defamation per se because she stated that Mr. Hodson and the Omnis family of companies committed and are committing the federal crime of human trafficking.

22. Ms. Christian compared Mr. Hodson to Jeffrey Epstein, a convicted sex offender, implying that Mr. Hodson engaged in sexual misconduct and sex trafficking.

23. Ms. Christian stated that the Omnis family of companies "married off" a woman they trafficked to a "Mormon guy," harming Omnis' business by implying the companies' LDS executives coerced a woman into joining their religion.

24. Upon information and belief, Ms. Christian has called other individuals and communicated a similar message about Mr. Hodson and Omnis to those individuals.

25. The damage done to Mr. Hodson and Omnis' reputations is irreparable.

26. Accordingly, Ms. Christian is liable for defamation.

WHEREFORE, Counterclaim Plaintiffs respectfully request that judgment be entered in their favor and against Ms. Christian in an amount in excess of nominal damages, exclusive of costs and interest, to compensate Defendants for their losses, and that the Court award such other relief as it deems appropriate.

Dated: October 15, 2024

Respectfully submitted,

/s/ Matthew J. Hank

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**CERTIFICATE OF SERVICE**

I certify that on this 15th day of October 2024, a copy of the Defendants' Counterclaim was filed using the Eastern District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon the following counsel of record:

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*/s/ Matthew J. Hank*  
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